

AUSA: Andrew Jones

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

EDSON BROWN,

Defendant.

COMPLAINT

Violations of 18 U.S.C. §§ 922 & 933

COUNTY OF OFFENSE:
BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

Tyler Miceli, being duly sworn, deposes and says that he is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives, and charges as follows:

COUNT ONE
(Firearms Trafficking Conspiracy)

1. From at least in or about October 2023 through at least in or about February 2025, in the Southern District of New York and elsewhere, EDSON BROWN, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to traffic in firearms, in violation of Title 18, United States Code, Section 933.

2. It was a part and an object of the conspiracy that EDSON BROWN, the defendant, and others known and unknown, would and did ship, transport, transfer, cause to be transported, and otherwise dispose of a firearm to another person in and otherwise affecting interstate commerce, and did so knowing and having reasonable cause to believe that the use, carrying, and possession of a firearm by the recipient would constitute a felony as defined in Title 18, United States Code, Section 932(a).

(Title 18, United States Code, Section 933(a)(3).)

COUNTS TWO THROUGH TEN
(Illegal Transportation and Receipt of Firearms)

3. On or about the dates listed below, in the Southern District of New York and elsewhere, EDSON BROWN, the defendant, not being a licensed importer, licensed manufacturer, licensed dealer, or licensed collector of firearms within the meaning of Chapter 44 of Title 18, United States Code, willfully and knowingly transported and received firearms into the state in which he resided, said firearms having been purchased and obtained outside of the state in which he resided, to wit, on or about the dates described below, BROWN resided in New York, purchased the firearms described below in South Carolina, and transported the firearms to New York.

<u>Count</u>	<u>Approximate Date</u>	<u>Description</u>
Two	October 11, 2023	Six semiautomatic handguns

Three	October 31, 2023	Three semiautomatic handguns
Four	February 9, 2024	One semiautomatic handgun
Five	February 28, 2024	Five semiautomatic handguns
Six	April 21, 2024	Seven semiautomatic handguns and one revolver
Seven	June 9, 2024	Eight semiautomatic handguns and one revolver
Eight	August 5, 2024	Seven semiautomatic handguns and one revolver
Nine	September 1, 2024	Eight semiautomatic handguns and two revolvers
Ten	October 19, 2024	Ten semiautomatic handguns and two revolvers

(Title 18, United States Code, Section 922(a)(3).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

4. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) and am currently assigned to the New York ATF/NYPD Joint Firearms Task Force. I am one of the law enforcement agents responsible for this investigation. This affidavit is based on my experience conducting this investigation, which includes, among other sources of evidence, my review of records maintained by the ATF, NYPD, and other law enforcement agencies; cellphone toll records; cellphone location records; and other business records.

Overview of the Case

5. The ATF is investigating a scheme to traffic firearms from South Carolina to New York. During the investigation, EDSON BROWN, the defendant, has been identified as a New York resident and gun trafficker who transports firearms from South Carolina to New York where he then sells and distributes the guns. BROWN is a convicted felon, who in November 2009 was sentenced to two years’ incarceration in Bronx County Supreme Court after he pleaded guilty to attempted second-degree criminal possession of a weapon, in violation of New York law. ATF records reflect that BROWN is not a licensed firearms dealer, importer, collector, or manufacturer.

6. To traffic firearms from South Carolina to New York, EDSON BROWN, the defendant, worked with a firearms straw purchaser who is a South Carolina resident (“CC-1”). For the gun purchases in South Carolina, BROWN traveled from New York to South Carolina to complete the purchases and afterwards traveled back from South Carolina to New York with the guns. During many of the gun purchases, BROWN impersonated CC-1 by using CC-1’s South Carolina driver’s license. BROWN then falsely certified that he was CC-1 and purchased dozens of firearms using CC-1’s identity.

7. Between in or about October 2023 and in or about February 2025, EDSON BROWN, the defendant, trafficked approximately 65 firearms from South Carolina to New York. These 65 firearms were purchased across 14 transactions at gun stores in South Carolina. Between in or about April 2024 and in or about August 2024, five of those firearms were recovered in New York City by the NYPD during arrests or investigations. All five of the recovered firearms were seized by the NYPD within a year of being purchased in South Carolina, and three of the recovered firearms were seized by the NYPD less than two months after they were purchased in South Carolina.

8. On February 22, 2025, EDSON BROWN, the defendant, was arrested outside a gun store in South Carolina after BROWN exited the store with CC-1, who had just purchased three firearms.

The “Trafficked Guns”

9. From reviewing ATF records of firearm purchases in South Carolina, I am aware that between in or about October 2023 and in or about February 2025, approximately 65 firearms were purchased from licensed firearms dealers in South Carolina by someone presenting identification in the name of CC-1. Collectively, those 65 firearms are referred to in this affidavit as the “Trafficked Guns.” As described below, many of these purchases were completed in CC-1’s name, but were in fact made by EDSON BROWN, the defendant, which BROWN did by impersonating CC-1 and using CC-1’s driver’s license. The table below is based on ATF records of the purchases and summarizes the purchases of all 65 of the Trafficked Guns.

<u>Purchase No.</u>	<u>Date</u>	<u>Location</u>	<u>Description</u>
1	October 9, 2023	West Columbia, SC	3 x Taurus, 9mm semiautomatic handguns
2	October 10, 2023	Batesburg, SC	3 x Taurus, 9mm semiautomatic handguns
3	October 30, 2023	Newberry, SC	3 x Taurus, 9mm semiautomatic handguns
4	February 8, 2024	Batesburg, SC	1 x Taurus, 9mm semiautomatic handgun
5	February 27, 2024	Newberry, SC	1 x Diamondback Arms, .380 semiautomatic handgun 1 x Ruger, .380 semiautomatic handgun 1 x Smith & Wesson, 9mm semiautomatic handgun 2 x Taurus, 9mm semiautomatic handguns
6	April 19, 2024	Newberry, SC	1 x Charter Arms, .38 revolver 1 x KelTec, .32 semiautomatic handgun 1 x Ruger, .9mm semiautomatic handgun 1 x Ruger, .380 semiautomatic handgun 3 x Taurus, 9mm semiautomatic handguns 1 x Walther, .22 semiautomatic handgun
7	June 8, 2024	Newberry, SC	3 x Ruger, .380 semiautomatic handguns 1 x Ruger, .9mm semiautomatic handgun 2 x Taurus, 9mm semiautomatic handguns 1 x Taurus, .38 revolver 1 x Taurus, .40 semiautomatic handgun 1 x Taurus, .22 semiautomatic handgun
8	August 3, 2024	Columbia, SC	1 x Armscor, .38 revolver 1 x Canik, 9mm semiautomatic handgun 1 x Ruger, .380 semiautomatic handgun 1 x Taurus, .38 revolver 1 x Taurus, .40 semiautomatic handgun 1 x Taurus, 9mm semiautomatic handgun

			1 x Walther, .22 caliber semiautomatic handgun
9	August 3, 2024	Newberry, SC	1 x Ruger, .380 semiautomatic handgun
10	August 31, 2024	Columbia, SC	1 x Ruger, .380 semiautomatic handgun 1 x Ruger, .9mm semiautomatic handgun 1 x Springfield Armory, .9mm semiautomatic handgun 1 x Taurus, .357 revolver 1 x Taurus, .38 revolver 1 x Taurus, .40 semiautomatic handgun
11	August 31, 2024	Columbia, SC	1 x Phoenix Arms, .22 semiautomatic handgun 1 x Smith & Wesson, .40 semiautomatic handgun 1 x Taurus, .380 semiautomatic handgun
12	August 31, 2024	Newberry, SC	1 x Taurus, 9mm semiautomatic handgun
13	October 19, 2024	Columbia, SC	1 x Canik, 9mm semiautomatic handgun 1 x Glock, .380 semiautomatic handgun 2 x Ruger, 9mm semiautomatic handguns 1 x Ruger, .380 semiautomatic handgun 1 x Smith & Wesson, 9mm semiautomatic handgun 1 x Smith & Wesson, .380 semiautomatic handgun 2 x Taurus, 9mm semiautomatic handguns 1 x Taurus, .40 semiautomatic handgun 1 x Taurus, .357 revolver 1 x Taurus, .38 revolver
14	February 22, 2025	Columbia, SC	1 x Taurus, 9mm semiautomatic handguns 1 x Rock Island Armory .38 revolver 1 x Ruger, .380 semiautomatic handgun

10. Based on NYPD reports, I am aware that in or about 2024, at least five of the Trafficked Guns were recovered in New York City by the NYPD during arrests or investigations.

a. On or about April 13, 2024, a Taurus, 9mm semiautomatic handgun was recovered by NYPD officers in the Bronx. That handgun was purchased on February 27, 2024, in Newberry, South Carolina. The person who was arrested with this gun was charged with, among other offenses, felony second-degree criminal possession of a firearm, in violation of New York law.

b. On or about July 22, 2024, a Ruger, 9mm semiautomatic handgun was recovered by NYPD officers in the Bronx. That handgun was one of the nine firearms purchased on June 8, 2024, in Newberry, South Carolina. The person who was arrested with this gun was charged with, among other offenses, felony third-degree criminal possession of a firearm, in violation of New York law.

c. On or about July 28, 2024, a Ruger, 9mm semiautomatic handgun was recovered by NYPD officers in the Bronx. That handgun was one of the eight firearms purchased on April 19, 2024, in Newberry, South Carolina. The person who was arrested with this gun was charged with, among other offenses, felony second-degree criminal possession of a firearm, in violation of New York law.

d. On or about July 29, 2024, a Ruger, .380 semiautomatic handgun was recovered by NYPD officers in the Bronx. That handgun was one of the nine firearms purchased on June 8, 2024, in Newberry, South Carolina. This firearm was recovered after it was used to commit an armed robbery.

e. On or about August 17, 2024, a Taurus, 9mm semiautomatic handgun was recovered by NYPD officers in Brooklyn. That handgun was one of the three firearms purchased on October 9, 2023, in West Columbia, South Carolina. The person who was arrested with this gun was charged with, among other offenses, felony second-degree criminal possession of a firearm, in violation of New York law.

EDSON BROWN, the Defendant, Impersonated CC-1 to Buy the Trafficked Guns

11. ATF forms completed during purchases of the Trafficked Guns reflect that on several occasions, the purchaser gave his phone number as a specific phone number with a 929 area code (the “929 Number”). Records obtained from Apple for the 929 Number show that it is used for an Apple account subscribed to “Donte Brown” and that the physical address for the account is at an apartment building in the Bronx, which is the same building that has been listed as the address for EDSON BROWN, the defendant, during multiple arrests in New York.

12. I have reviewed surveillance videos, or seen still images taken from surveillance videos, that show multiple of the purchases of the Trafficked Guns in South Carolina. Specifically, I have seen videos or photographs from purchases 7, 9, 11, and 12, described above. Based on comparing known images of EDSON BROWN, the defendant, to the person seen purchasing the Trafficked Guns, I believe that BROWN is conducting the transactions. Shown below is an image of BROWN leaving the firearms store in Newberry, SC on or about June 8, 2024 following the purchase of eight firearms. As described above in paragraphs 10.b and 10.d, two of those firearms were recovered by the NYPD in the Bronx, in July 2024.



13. Cellphone location records show that EDSON BROWN, the defendant, traveled from New York to South Carolina to purchase and transport the Trafficked Guns and returned to New York after buying the guns. As described above, the 929 Number—which I believe to be BROWN’s phone number based on the associated Apple account information—was the phone number used by the purchaser of many of the Trafficked Guns. I have reviewed cellphone location data for the 929 Number that was obtained pursuant to a search warrant issued by a United States Magistrate Judge in the Southern District of New York. This location data shows that BROWN traveled from New York to South Carolina the day before the Trafficked Guns were purchased, was around the area of the guns stores around the time the Trafficked Guns were purchased, and returned to New York from South Carolina soon after the Trafficked Guns were purchased.

a. As described in the table above, on February 27, 2024, five of the Trafficked Guns were purchased at a gun store in Newberry, SC. Cellphone location records for the 929 Number show that the phone was in New York City on February 26, 2024, traveled to South Carolina and was in the area of the gun store on February 27, 2024, and returned to New York City on February 28, 2024.

b. As described in the table above, on April 19, 2024, eight of the Trafficked Guns were purchased at a gun store in Newberry, SC. Cellphone location records for the 929 Number show that the phone was in New York City on April 18, 2024, traveled to South Carolina and was in the area of the gun store on April 19, 2024, and returned to New York City on April 21, 2024.

c. As described in the table above, on June 8, 2024, nine of the Trafficked Guns were purchased at a gun store in Newberry, SC. Cellphone location records for the 929 Number show that the phone was in New York City on June 7, 2024, traveled to South Carolina and was in the area of the gun store on June 8, 2024, and returned to New York City on June 9, 2024.

d. As described in the table above, on August 3, 2024, eight of the Trafficked Guns were purchased at gun stores in Newberry, SC and Columbia, SC. Cellphone location records for the 929 Number show that the phone was in New York City on August 2, 2024, traveled to South Carolina and was in the area of the gun stores on August 3, 2024, and returned to New York City on August 5, 2024.

e. As described in the table above, on August 31, 2024, ten of the Trafficked Guns were purchased at gun stores in Newberry, SC and Columbia, SC. Cellphone location records for the 929 Number show that the phone was in New York City on August 30, 2024, traveled to South Carolina and was in the area of the gun stores on August 31, 2024, and returned to New York City on September 1, 2024.

f. As described in the table above, on October 19, 2024, twelve of the Trafficked Guns were purchased at a gun store in Columbia, SC. Cellphone location records for the 929 Number show that the phone was in New York City on October 18, 2024, traveled to South Carolina and was in the area of the gun store on October 19, 2024, and returned to New York City on October 20, 2024.

On February 22, 2025, EDSON BROWN, the Defendant, Was Arrested with CC-1
at a Gun Store in South Carolina

14. During the evening of February 20, 2025, real-time location information for the 929 Number, which was being provided pursuant to a judicially authorized warrant, indicated that the phone had left New York and was traveling south. On or about February 21 and February 22, 2025, the location information for the phone indicated that the phone was in South Carolina. While conducting surveillance of EDSON BROWN, the defendant, on February 22, 2025, law enforcement agents observed BROWN and CC-1 together inside a gun store in Columbia, SC, which was consistent with the location information for the 929 Number. The agents further observed CC-1 purchase three firearms at the gun store and then saw CC-1 and BROWN exit the store together and get into a car that BROWN was driving. BROWN and CC-1 were subsequently arrested. At the time of his arrest, BROWN was in possession of the phone with the 929 Number.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of EDSON BROWN, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

S/ by the Court with permission

Tyler Miceli
Special Agent, ATF

Sworn to me through the transmission of
this Complaint by reliable electronic
means (telephone), this 22nd day of February, 2025.



THE HONORABLE ROBERT W. LEHRBURGER
United States Magistrate Judge
Southern District of New York